The purpose of this filing is to inform you of my extremely strong oppostion to the proposal of permitting Broadband Over Power Line (BPL) technology for internet access (Reference Docket 03-104) Numerous surveys, studies and trials in other countries and in the United States have shown this technology to have many liabilities. to the users of the BPL systems, to the general public who receive over the air AM, shortwave, and FM radio and VHF TV broadcasting, to licensed radio services in the RF spectrum from the broadcast band through low-VHF, to local and state and federal government agencies using this portion of the spectrum, including those involved in saftey of life communications and homeland security, and licensed amateur radio communications.

I am especially concerned on the potential for interference to local government and amateur radio emergency and disaster communications, which are conducted mainly on HF and low-VHF frequencies.

The broadband spectrum of radiated RF energy associtated with BPL technology have been shown to cause severe interference to all types of radio broadcasting and communications in the aforementioned portions of the RF spectrum. The NTIA has filed its opposition to BPL technology deployment, citing the potential for severe interference with critical government radio communcations systems and networks supporting public safety, national defense, and homeland security. The American Radio Relay League, representing the amateur radio service, has also presented the results of surveys showing that BPL technology is both a serious source of spectrum pollution, as well as a fragile technology that is very susceptible to disruption by licensed RF transmissions in the spectrum which it would "share" with the licensed users. The National Association of Broadcasters has also gone on record as being opposed to BPL, becasue of its potential to interfere with over the air AM,FM, and TV broadcasting. With all of the government and non-governmental licensed users of the RF spectrum in opposition to BPL, the FCC should not permit BPL deployment.

The technology is technically deficient as a service to its internet service suscribers, in that it will be very susceptible to interference from licensed radio transmissions in the HF and VHF spectrum. Although it is my understanding that as a Part 15 unliscensed system, its users must accept any interference received from licensed servies, the average consumer who woud pay for internet service via BPL would not understand this limitation, and would not accept living with inteference. This will no doubt generate tremendous dissatisfaction with the service, which will first be directed toward people such as myself, who are operating within the requirements of the licensed amateur service, rather than the service providers. There have been many surveys which have shown the fragility of BPL networks to interference from legitimate spectrum emitters. BPL will be a "bad deal" for the internet subscriber, who will be sold a service which will be inherently unreliable. Reliablity of connectivity, along with speed and security are the most important consumer requirements for internet service.

This purported cost advantages of BPL technology are not a viable

trade off for the associated inherent mutual interference issues. Widespread proliferation of other more robust technologies such as internet over broadband cable systems with standards for RF leakage and susceptibility, fiber optic networks, and ultra high frequency wireless networking at non-interfering portions of the RF spectrum are better alternatives. BPL is an ugly, spectrum polluting dinosaur of a network technology and should not be permitted. The vague requirement for trial BPL systems to employ "adaptive inteference mitigation techniques" is an unenforceable pipe dream. Don't let the BPL genie out of the bottle! Listen to the Europeans and Japanese!

As a licensed amateur radio operator for over 37 years, I have observed the gradual deterioration of ambient RF spectrum noise levels as more and more RM emitting technology (computers, microprocessor controlled appliances, local wireless networking), all supposedly FCC Part 15 compliant, populates our homes, businesses, and vehicles.

Deploying a new technology highly capable of wideband spectrum pollution by its inherent design concept (low power RF emission radiated via overhead power lines which are prevasive throughout our neighborhoods and countryside) is not just technologically unsound, it is technological madness. It is my understanding that one of the most important missions of the FCC is to ensure that all users of the RF spectrum are fairly protected from interference from other services. This has been successfully accomplished for decades through careful spectrum management and regulations which require the various licensed services to not interfere with the others. From what I have observed of the FCCs recent actions and positions on BPL technology, you appear to be a "cheerleader" for BPL, promoting it without any due regard for the horffic interference it will no doubt, and has already been shown, to cause to licensed radio services and broadcasting. The FCC's mission is spectrum protection, not promotion of spectrum pollution!

Sincerely,

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